



TENNESSEE DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
**JACKSON ENVIRONMENTAL FIELD OFFICE**  
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March 4, 2010

Arista Brisbon, Director of Safety and Environmental  
ABB Inc.  
1128 South Cavalier Drive  
Alamo, Tennessee 38001-3813 USA

Re: ABB Inc.  
TMSP # TNR051468  
Crockett County

Dear Ms. Brisbon:

On Wednesday, March 3, 2010, I met with you and Tom Painter for the purpose of conducting a Tennessee Multi-sector Storm Water Permit (TMSP) Compliance Inspection. As you recall, the inspection has basically three parts; up-dating general information, a detailed review of ABB's Storm Water Pollution Prevention Plan (SWPPP), and a walk through of your facility with the major focus being directed towards stormwater flows and potential pollution issues.

The facility tour revealed a stormwater system that allows actual control of all major runoff. There are three major control points. The northern (NE corner) most outfall consists of a concrete wall that creates a small swale. The water is only discharged after a visual inspection. If the water is determined okay for discharge, a pump is engaged to pump the water past the wall. The pump switch is inside and in a locked box. The keys for the lock are assigned to prevent an unauthorized discharge.

There is a secondary containment area for the above-ground oil storage. There is a locked valve that would prevent any discharge from this area without the water quality being evaluated. A discharge from this area would still have to go through the primary control points before it technically becomes a discharge.

The other primary control point is on the southeast area of the building. This discharge point also maintains a small concrete wall that creates another small swale. As with the oil storage area, a locked valve must be open before a discharge can occur.

Independent of the before mentioned stormwater outlets, there is one storm drain inlet south of a loading dock. This inlet drains south and then west. It is essentially a direct discharge into Kail Creek. For protection against any spillage, a drain inlet cover is stored just inside the building, adjacent to the loading dock. If something should be spilled near that inlet, it could be covered within a minute of realization of an incident.

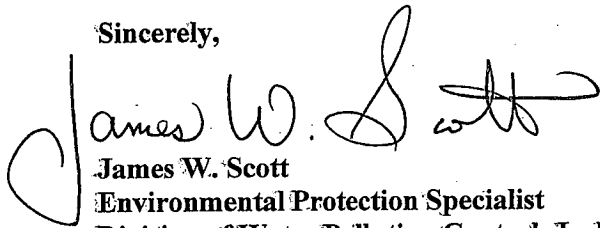
The SWPPP was found to be a very well written document. The listing of each change made to the SWPPP since November 1, 1997, though not required, was a real nice addition. The description of duties for the Pollution Prevention Team was well thought out, and a very nice addition to the document.

As I have reviewed the inspection in my mind, it occurred to me that with a little clean-up and attention in the back portion of your plant, you could probably qualify for "No Exposure Certification" (NEC). Even though you would have to re-certify every five years, the SWPPP requirements would go away for you and you would no longer have to pay the annual maintenance fee. I don't know if you would want to consider this option or not, but I have attached a NEC application for you to review. If you can honestly answer "no" to the eleven questions in the "Exposure Checklist" in section C, you would qualify and I would support you. If you decide to pursue the "NEC", complete the application and return it to me and I will process it for you.

As an inspector, I was very please with all aspects of your stormwater program. I appreciated you time and I'm extremely pleased with your conscientious environmental attitude, along with Tom Painter, and the ABB, Inc. Company.

I appreciate the courtesy and cooperation shown to us during this inspection. If you have any questions or need additional information, feel free to contact me by phone at 731-512-1362 or by e-mail at [James.W.Scott@tn.gov](mailto:James.W.Scott@tn.gov).

Sincerely,



James W. Scott  
Environmental Protection Specialist  
Division of Water Pollution Control, Jackson

cc: Permit Section - DWPC, CO  
Ms. Pat Patrick - DWPC, JFO  
Dave Boston, Plant Manager  
Tom Painter, Senior Environmental Engineer  
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